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defendant were formally married and entered into matrimonial relations thinking that complainant's then husband was dead. Later, in order to place the legality of their relation beyond question, complainant procured a divorce from her lawful husband, who was in fact alive, but in parts unknown, after which defendant, in the presence of witnesses, assured complainant that she was his lawful wife, and that no other ceremony was necessary, and thereby induced complainant, by reliance on such representations, to remain with him as his wife for over twenty years. Under these circumstances it was held that defendant was estopped from denying the legality of the marriage with complainant.

BLOODHOUNDS.—VA. CODE 1904, SEC. 4173C.—In *Denham v. Commonwealth*, 84 S. W. 538, the Kentucky Court of Appeals takes issue with the holding of the Nebraska Supreme Court that in a prosecution for crime evidence of the fact that bloodhounds went from the scene of the crime to defendant's home is not admissible in evidence. In the case mentioned it is held that, in a prosecution for assault with intent to kill, evidence of the trailing of defendant by bloodhounds, which were shown to have been of good breeding and to have been carefully trained in tracking men, and which had tracked and aided in the capture of many criminals, was admissible, although the pedigrees of the dogs were not asked about or stated with particularity.

Sec. 4173c of Va. Code 1904 provides especially for the raising and training of bloodhounds for "police purposes."

MARRIAGE BROKERAGE CONTRACT.—The Supreme Court of Iowa holds a "marriage brokerage contract" to be invalid in the case of *In re Grobe's Estate*, 102 N. W. 804. The deceased agreed to pay complainant a certain amount if she would go to Chicago and see a woman whom deceased was desirous of marrying, and give her information concerning him. It did not appear whether deceased already had a contract of marriage with the woman or not, and in this respect the case differs somewhat from the ordinary marriage brokerage case. But the court holds that the rule that it is contrary to public policy to allow a recovery for services rendered in procuring a marriage is as applicable to advice or solicitation with reference to carrying out a marriage contract as it is with reference to the formation of such a contract.

TRADING STAMPS.—VA. CODE 1904, SEC. 3827a.—In *People v. Zimmerman*, 92 N. Y. Sup. 497, the New York statute prohibiting dealing in trading stamps unless the stamp shall have legibly printed on the face thereof its redeemable value in money, and requiring it to be redeemed in goods or money at the option of the holder, as well as subjecting the person charged with its redemption to liability for its face value, but excepting from its provisions tickets or coupons issued by a merchant or manufacturer in his own name, and redeemable by him, is held to be unconstitutional, not only because it is unjustifiable as an exercise of the police power,

and constitutes an unwarranted interference with legitimate business, but because the provision which allows merchants or manufacturers to issue such stamps constitutes an arbitrary discrimination in favor of such persons. The Virginia statute (1897-8 p. 442) prohibiting the use of trading stamps was declared unconstitutional in *Young's Case*, 101 Va. 853.

ESTOPPEL TO PLEAD SPECIAL ACT.—A case which is rather peculiar because of the novelty of the contention that a person for whose benefit a special act was passed may be estopped to assert it is that of *Bray v. Williams*, 49 S. E. 887. The Code of North Carolina imposes a penalty on registers of deeds for failure to make a record of marriage licenses, and authorizes any person to sue for the penalty. After suit was brought against a register of deeds for failure to comply with this statute, defendant's attorney prepared a special act, which he gave to the county representative, and which plaintiff alleged was passed under an agreement that it was to be introduced and passed through its several readings on the same day, sent to the Senate and passed on the following day, so that plaintiff should have no time to be heard, and it was contended that these facts estopped defendant from claiming the benefit of the act. It was held, however, that as there was no misrepresentation of any fact to the General Assembly, and as it was not claimed that it was passed in violation of any constitutional provision, the principle of estoppel did not apply.

EMINENT DOMAIN—DAMAGES.—The defendant's contention that in assessing damages for the condemnation of a railroad right of way the plans and prospects of the owner of the land should be considered in enhancement of the damages gives rise to the case of *Dowie v. Chicago W & N. S. R. Co.*, 73 N. E. 354. The railway company condemned a strip of land within the limits of Zion City, and defendant Dowie (who, by the way, is the only person who owns any land in Zion City) contended that the facts that he had formed a great plan for the salvation and upbuilding of humanity, had formed a city of 10,000 population in some two years, and intended to gather there all of the 100,000 members of his church, should be considered in determining the value of the land. Other land in the immediate vicinity was worth only \$200 an acre, while defendant claimed that owing to the facts mentioned his property was worth \$13,000 an acre. It is, however, decided, that while every one has a right to entertain any religious belief he may see fit, this right does not carry with it any increased or additional property rights, and that the value of his property when taken for public use must be measured in the same manner as other property owned by other people in the same vicinity and similarly situated.

ATTACHMENTS—GROUNDS FOR—SEC. 2959, VA. CODE 1904.—The following decisions of the Supreme Court of West Virginia, construing sec. 1, Ch. 106, of the West Virginia Code, practically identical with sec. 2959 of our Code,